

**From:** Grant Rahmeyer <[grant@rah.law](mailto:grant@rah.law)>  
**Sent:** Tuesday, May 9, 2023 12:35 PM  
**To:** James O'Brien <[jobrien@bwoattorneys.com](mailto:jobrien@bwoattorneys.com)>  
**Cc:** Norman Rouse <[nrouse@cwrcave.com](mailto:nrouse@cwrcave.com)>; dan@ramsdelllaw.com; David Schroeder <[bk1@dschroederlaw.com](mailto:bk1@dschroederlaw.com)>  
**Subject:** Ramsdell Bankruptcy

Mr. O'Brien,

Please allow this to serve as my firm's response to the subpoena that was issued to my law firm in regards to Mr. Ramsdell's bankruptcy. As to the Fowler/Balzer bad faith matter, which the defendants required us to make sure the underlying wrongful death case was closed as well, all fees attributable to Mr. Ramsdell will be issued to the bankruptcy trustee. I have already confirmed this with Mr. Rouse and will proceed accordingly.

As to the remaining matters requested in the subpoena, these requests seek information protected by the attorney client, work product, and confidentiality concerns of the settlement agreements.

Unfortunately, I already have matters scheduled for Friday morning so I will not be able to attend the deposition. If you still need me to show for a deposition, I am amenable to doing so at an agreeable time but will have to stand on the above-objections due to the privilege and confidentiality concerns.

If you have any other questions or concerns, please do not hesitate to give me a call.  
Many thanks,

*Grant Steffen Rahmeyer*

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